

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Mikayla Cheyenne Savage

Plaintiff,

vs.

Harris County, Texas, et al.

Defendants.

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CIVIL ACTION NO. H-4:24-cv-00666

PLAINTIFF’S MOTION TO MODIFY SCHEDULING ORDER

Plaintiff Mikayla Savage (“Plaintiff”) moves for a modification of this Court’s Scheduling Order (ECF No. 41) to extend the existing case schedule.

In support of her motion, Plaintiff states the following:

1. Good cause exists for a limited extension of the case schedule to allow Plaintiff to pursue discovery from Defendants. Each Defendant moved to dismiss Plaintiff’s First Amended Complaint, during the pendency of which discovery was stayed. The Court entered a minute order on Defendants’ motions on November 22, 2024. An extension of the discovery deadlines will allow Plaintiff time to commence discovery and prosecute her case fully.

2. For these reasons, Plaintiff respectfully requests that the Court extend the existing case deadlines as follows:

- a. Plaintiff shall identify witnesses by a report listing the qualifications of each expert, each opinion that the expert will present, and the basis for it, on or before June 2, 2025, and her rebuttal on or before July 21, 2025.

- b. Defendants shall identify witnesses by a report listing the qualifications of each expert, each opinion that the expert will present, and the basis for it, on or before July 2, 2025.
- c. Discovery must be completed by August 4, 2025.
- d. Dispositive and non-dispositive motions (except motions *in limine*) will be filed by September 4, 2025.
- e. Joint pretrial order and motions *in limine* will be filed on or before December 4, 2025.
- f. Trial will begin on December 11, 2025.

WHEREFORE, Plaintiff moves the Court to modify its Scheduling Order (ECF No. 41) to conform to the proposal set forth herein.

[Signature page follows]

Dated: December 19, 2024

Respectfully submitted,

/s/ Karley Buckley

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Attorneys for Plaintiff Mikayla Cheyenne Savage

CERTIFICATE OF CONFERENCE

On December 13, 2024, counsel for Plaintiff attempted to confer on Plaintiff's Motion via email to counsel for Defendants. On December 17, 2024, Plaintiff's counsel again sought to confer on Plaintiff's Motion via email to counsel for Defendants. On December 19, 2024, Plaintiff's counsel again sought to confer on Plaintiff's Motion via email to counsel for Defendants. Each email detailed the relief sought and requested counsel for Defendants to indicate whether they consented to, or opposed the relief sought by Plaintiff's Motion. No response was received to any of the emails.

/s/ Karley Buckley
Karley Buckley

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document has been served electronically via email on December 19, 2024 on all defense counsel of record.

/s/ Karley Buckley
Karley Buckley